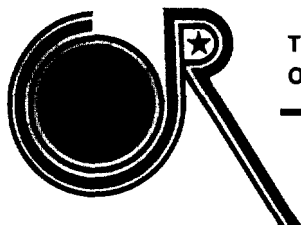


95-176



THE COUNCIL OF  
ORGANIZATIONAL REPRESENTATIVES ★

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February 28, 1996

Acting Secretary William F. Caton  
Federal Communications Commission  
1919 M Street NW, Room 234  
Washington DC 20554

Dear Secretary Caton:

Enclosed are the original and nine copies of the comments from The Council of Organizational Representatives (COR) on the FCC Notice of Inquiry concerning closed captioning of video programming.

The issue of closed captioning of video programming is of vital concern to our constituency, the 28 million people who are deaf or hard of hearing in this country, and we appreciate the opportunity to be able to submit comments.

Sincerely,

Donna L. Sorkin  
Co-chair, COR  
Self Help for Hard  
of Hearing People, Inc.  
7910 Woodmont Avenue, Suite 1200  
Bethesda, MD 20814

Elizabeth H. O'Brien, Ed.D.  
Co-chair, COR  
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of the Deaf  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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In the Matter of )  
Closed Captioning and Video ) MM Docket No. 95-176  
Description of Video Programming )

DOCKET FILE COPY ORIGINAL

COMMENTS OF

COUNCIL OF ORGANIZATIONAL REPRESENTATIVES

I. Introduction.

The Council of Organizational Representatives (COR) provides a forum for public policy issues related to persons who are deaf or hard of hearing. It is a coalition of national organizations each of which is committed in COR to improve the quality of life for consumers. Member organizations may vary in size, mission, and services but all have an international or regional scope of responsibility to persons who are deaf or hard of hearing. COR functions to share information and resources, advocate for legislation of mutual interests and benefit, and promote public awareness of related issues.

COR members represent a spectrum of organizations for and of persons who are deaf or hard of hearing, including: consumer organizations; organizations of hearing care professionals; and providers of educational, hearing health care, or technological services. The organizations comprising COR are:

Alexander Graham Bell Association for the Deaf, Inc.

American Academy of Otolaryngology--Head and Neck Surgery  
American Deafness and Rehabilitation Association  
American Society for Deaf Children  
American Speech-Language-Hearing Association  
Auditory-Verbal International, Inc.  
Convention of American Instructors of the Deaf  
Conference of Educational Administrators Serving the Deaf  
The Caption Center  
Deafness Research Foundation  
National Association of the Deaf  
National Captioning Institute  
National Cued Speech Association  
League for the Hard of Hearing  
Registry of Interpreters for the Deaf  
Self Help for Hard of Hearing People, Inc.  
Telecommunication for the Deaf, Inc.

## **II. Benefits of Closed Captioning**

Accessing telecommunications is vital in today's world and captioning is the key to ensuring that people who are deaf or hard of hearing can get their news, information, education, and entertainment from TV just like everyone else. People who cannot access this information are at a disadvantage in all aspects of their everyday lives, including the workplace.

It is estimated that one in nine of the population has hearing

loss and this rises to one in three over the age of 65. As people are living longer, it is predicted that by the year 2000, 40 million people in the U.S. over the age of 65 will have some degree of hearing loss. Many millions of them can benefit from captioning. For people with severe to profound hearing loss, captioning is the only way for them to watch television -- a medium which has an enormous impact on all of their lives.

Other audiences can benefit from captioning as well. Research and anecdotal evidence shows that captioning has improved reading and English skills for children, adults learning to read, persons learning English as a second language, and remedial readers. In addition, captioning helps all viewers in noisy locations such as transportation terminals, hotel lobbies, fitness centers, and restaurants, or in quiet ones such as hospitals, libraries, and government and private offices. In summary, captioning is critical to people with hearing loss and enormously helpful to many millions more.

### III. Availability of Closed Captioning

Although 100% of prime time and children's programming on network broadcasts are captioned, most of the top 25 basic cable stations caption few or none of their programs. With the exception of CNN and USA, on average, fewer than 8% of basic cable programs are captioned. Similarly, few commercial advertisements are captioned, and hardly any coming attractions, program recaps, program reviews, or station breaks are captioned, on either

broadcast networks or cable stations.

There are considerable differences in both the quality and quantity of captioning for local news programs. Those local newscasts which are captioned are the result of intense advocacy efforts on the part of concerned groups and individuals. Even in communities where the local news is captioned it does not always provide complete access. For instance, in some places only the news read from a prompting board is captioned leaving uncaptioned all weather reports, all on-site reporting, and informal discussion between newscasters. Individuals living in areas at risk for natural disasters, such as Florida or California, are at risk if they cannot receive emergency broadcasts. Deaf and hard of hearing people need the same periodic updates and instructions that other viewers are accustomed to.

#### IV. Funding of Closed Captioning

There is no doubt that the amount of captioning would not be where it is today without the funding provided by the federal government. The Department of Education has contributed in the past and still contributes today significant funds directly to network broadcasters for the captioning of syndicated programming. Because the Telecommunications Act of 1996 now mandates captioning, video providers and owners will soon be responsible for funding their own captioning. COR supports redirecting federal funds that are still available to funding research for improved captioning

technology, providing subsidies for programmers that can show undue burden, and providing seed money for the captioning of programs by low-budget programmers and video program owners.

#### V. Quality

The quality of closed captions varies considerably, and affects the usefulness of the captions. Even though the technology to allow options in placement of captions exists, captions are still placed at the bottom of the screen covering up identification information. Particularly difficult to understand is real-time captioning which scrolls fast and can be affected by captioning skill through misstroking, omitting a word, or failing to preprogram a word into their dictionary. Real-time accuracy for live television should be 98% or better. Looking to the future we urge the FCC to promote research into voice recognition which has come a long way in the last five years and could hold great promise for captioning.

The FCC should establish minimum standards to ensure the high quality of captioning services. These guidelines should include the development of standards for key issues like:

- Captioning should provide a complete interpretation of the audio program.
- Requirements for proper spelling, grammar, timing, accuracy

and placement of captions.

- Captions should include not only verbal information but other elements of the soundtrack such as sound effects or the name of songs being played.

- Reformatting as necessary when programming is changed (i.e., editing of movies for television).

- Ensuring that captioning remains intact as shows move from point of origination to local video provider. We often learn of problems involving captioned programs that are initially intact arriving scrambled or even stripped by the time such programs reach their final cable or local network destinations.

## VI. Transition

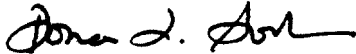
COR joins other consumer organizations in supporting a target of 100 percent captioning of all television programs. We also recognize that a reasonable timetable to reach that goal has to be set in place.

## VII. Conclusion

We thank the FCC for initiating this NOI to gather the information needed to develop regulations on closed captioning as mandated by the Telecommunications Act of 1996. We look forward to

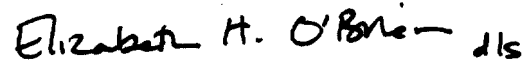
the FCC issuing captioning rules which will bring us closer to the ultimate goal of all Americans having access to all video services and programs.

Respectfully submitted,



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February 28, 1996



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